

MEMO ENDORSED

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February 11, 2008

VIA FACSIMILE

Hon. Victor Marrero
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

RECEIVED
FEB 11 2008
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**RE: Fortis Corp. Insur v. Total Qual. Logistics & Hills Trucking,
Index No.: 07-Civ-3731 (VM)**
February 15, 2008 scheduled case management conference
Request to attend by teleconference

Dear Judge Marrero:

This request is being transmitted by facsimile pursuant to a February 8, 2008 telephone conversation with your chambers.

This firm acts as local counsel for Defendant Total Quality Logistics ("TQL") in the above referenced matter. Keating, Muething & Klekamp, PLL ("Lead Counsel"), by Charles M. Miller, acts as lead counsel for TQL.

Lead Counsel and TQL are based in Ohio and cannot personally attend the above referenced (Rule 16) conference without great difficulty. Therefore TQL requests an accommodation that its Lead Counsel be permitted to participate in the said conference by telephone. Local counsel will attend the conference in person and provide any available assistance in order to facilitate the execution of this request.

Although there still is a pending motion to stay the said conference this request is being made now in order to avoid last-minute surprises. This firm awaits the Court's directions in all matters raised by this letter. Thank you for your consideration of this request.

Respectfully submitted,

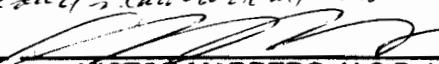


/s/ PAK & CHO, P.C.
BY: Sung-Yong Ahn (SA 3773)

cc: Mr. Charles M. Miller, Esq. (for TQL)
Ms. Lisa A. Scognamillo, Esq. (for Fortis Corp. Insurance)
Mr. Bennett Susser, Esq. (for Hill's Trucking, Inc.)

Request for Plaintiff's legal counsel
for defendant Total Quality Logistics
be authorized to participate by
telephone at the Conference with the Court
on the matter scheduled for 2-15-08.
Grant such arrangement with the
SO ORDERED: Victor Marrero, U.S.D.J.

2-11-08

DATE 
VICTOR MARRERO, U.S.D.J.